



## Position Statement from DSM to Panel 1

### Stepping up the Management of Tropical Tunas as Part of an Ecosystem-Based Management

While tuna conservation has made substantial progress over the past decade with many stocks recovering, many of which have been enabled through the development and application of MSE tested Management Procedures, for example the most recently adopted Management Procedures for Northern Atlantic Swordfish at last year's Commission Meeting.

We congratulate ICCAT and its Contracting Parties for this pursuit and encourage all Parties to continue this approach, closing the still existing gaps for species, such as skipjack and ensure that in the meantime at least existing TACs are allocated between fishing nations, especially for yellowfin tuna, to enable these TACs being actually met until more comprehensive Management Procedures will be in place.

However, the marine ecosystems in the Atlantic and the Mediterranean Sea are already suffering under the impacts of climate change on tropical tuna stocks, the health of marine ecosystems and an increasing risk of loss of biodiversity. Therefore, the Commission should acknowledge that management and conservation measures can no longer be taken in isolation but must integrate an ecosystem-based management approach, considering all species impacted by fisheries and the interdependences on the complete food web.

Specifically, populations of sharks and rays are massively impacted by ICCAT fisheries being both, a targeted species in several (multi-species) fisheries and a massive bycatch in almost all ICCAT fisheries. Due to the use of non-specific gear and the absence of prioritising a bycatch mitigation hierarchy, mortality levels of threatened shark species continue increasing or are unknown for many threatened shark species, including those shark species that ICCAT has recognised require specific protection by retention bans.

### We ask Panel 1 of the 25th ICCAT Commission Meeting to

#### **Adopt Management Procedures and take a precautionary Approach by**

- 1. Adopting an MP for western Atlantic skipjack MP.** Thereafter, MSE for multi-species MPs can be completed as a priority, noting that this is due in 2026. Guidance on management objectives for the different stocks should be provided to inform MSE testing and acceptable trade-offs when deciding on objectives for different species and how to reflect adaptation of MPs to climate changes need to be included.
- 2. Enforce compliance with the Bigeye Tuna TAC by allocation of quotas** between CPCs. Over the past five years catches of yellowfin have continued exceeding the TAC and will inevitably lead to an overfished state of this stock within the near future. DSM therefore recommends the allocation of the TAC between fishing nations and to review / improve the robustness of the existing management framework for yellowfin tuna.
- 3. Taking a precautionary approach when adjusting the TAC of bigeye tuna.** Although the recent stock assessment suggests that an increase might be possible, DSM cautions the Commission to take a precautionary approach and ensure a high probability for the stock to consistently remain in the green quadrant of the Kobe plot.

#### **Protect juvenile tropical Tunas by Maintaining FAD Closures**

In 2024 the Commission has reduced the duration of the annual FAD closure from 72 days to 45 days ([Rec 24-01](#)) claiming that benefits from the FAD closure on juvenile yellowfin and bigeye tuna are not clear.

In its 2025 meeting the Scientific Committee noted that nearly half of the impact on bigeye tuna spawning stock biomass (SSB) stems from purse seine fishing on floating objects. It also explained that the effects of

the recent full closure moratorium are not yet fully visible due to a lag in time between reduced catches of juvenile bigeye tuna on FADs and the impact of such reduced catches on bigeye SSB<sup>1</sup> highlighting that this “*impact pattern differs from the proportion of catches in weight by fishery type because of their selectivity.*”<sup>2</sup> Furthermore, the initial model results from the POSEIDON-EAO model “*suggest that reducing active FAD limits to moderate levels could lower ecological risks for juvenile bigeye by reducing reliance on FAD sets, while maintaining overall tuna catches at levels comparable to the current active FAD limit and proposed TAC.*”<sup>3</sup>

**Therefore,**

- 1. the Commission should await the Scientific Committee’s full analysis** and clear scientific advice on the conservation potential of a FAD moratorium.
- 2. the duration of the annual FAD closure should be maintained at 45 days** while returning to the previous 72-day closure period until the time when such specific scientific advice becomes available might be a more precautionary approach.
- 3. we recommend to further reduce the number of FADs per vessels** from the 288 FADs defined in Rec 24-01 for 2026 and 2027

### **Take an integrated Approach considering also the Impact of FADs on ETP-Species**

Besides the impact of a FAD moratorium on bigeye tuna and yellowfin tuna stocks the impact on vulnerable bycatch species, such as juvenile silks sharks and critically endangered oceanic whitetip sharks should be considered taking an ecosystem approach, a vital improvement needed in the management of fisheries to strengthen ocean resilience in times of increasing impacts from climate change. Juvenile silky sharks and oceanic whitetip sharks are known to aggregate with floating objects and fishing on FADs therefore results in a substantial but often overlooked bycatch of these sharks and other elasmobranch species such as devil rays depending on the area. Therefore, reduced setting on FADs by enforcing an annual FAD closure over a consecutive time and/or reducing the number of FADs will have also a positive effect on threatened sharks, especially vulnerable silky sharks that make up for 90% of the shark bycatch in purse seine fisheries when setting on FADs<sup>4</sup>.

**Therefore,**

- 1. we highlight that FAD closures also benefit ETP Species by reducing bycatch of juvenile sharks.** Reducing the number of FADs and introducing temporal-spatial FAD closures has been recommended by science as effective mitigation measures to reduce silky shark bycatch.<sup>5</sup> In the Indian Ocean more than 100,000 – 150,000 juvenile silky sharks were caught in MSC certified tuna fisheries alone<sup>6</sup> and a similar number of juvenile silky sharks was caught as FAD bycatch in the WCPFC between 2016 and 2019<sup>7</sup>. Most purse seine fleets don’t retain silky sharks with retention bans applying at WCPFC and ICCAT and vessels at IOTC and IATTC voluntarily discarding silky shark bycatch but mostly without reporting these discards. At ICCAT publicly available nominal catch information from the website shows discards of 32 - 374 t annually between 2017 and 2023 from the two main purse seine fleets.<sup>8</sup> However, total discards are likely substantially underestimated as most CPCs do not report their discards and even if reports are not available for all years. This reflects the overall lack of compliance with ICCAT’s reporting obligations for shark discards.

<sup>1</sup> ICCAT SCRS Report 2025, p.101

<sup>2</sup> ICCAT SCRS Report 2025, p. 192

<sup>3</sup> ICCAT SCRS Report 2025 p. 101

<sup>4</sup> Restrepo V. et al; Mitigation of Silky Shark Bycatch in Tropical Tuna Purse Seine Fisheries; Report number: ISSF Technical Report 2016-17; 2016; [10.13140/RG.2.2.25562.75202](https://doi.org/10.13140/RG.2.2.25562.75202)

<sup>5</sup> Filmlalter, J. D et al.; 2021; Movement behaviour and fishery interaction of silky sharks (*Carcharhinus falciformis*) in the tropical tuna purse seine fishery in the Western Indian Ocean ICES Journal of Marine Science; <https://doi.org/10.1093/icesjms/fsab119>

<sup>6</sup> Ziegler I.; Assessing the impact of drifting FADs on silky shark mortality in the Indian Ocean; IOTC-2022-WGFAD03-10-Rev1 2022; 3rd IOTC ad hoc working group on FADs (WGFAD03); online; [https://iotc.org/sites/default/files/documents/2022/10/IOTC-2022-WGFAD03-10\\_Rev1.pdf](https://iotc.org/sites/default/files/documents/2022/10/IOTC-2022-WGFAD03-10_Rev1.pdf)

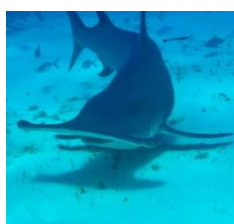
<sup>7</sup> LRQA Public Comment Draft Report PNA Western and Central Pacific Skipjack, Yellowfin and Bigeye Tuna Purse Seine; November 2023; Table 20; <https://fisheries.msc.org/en/fisheries/pna-western-and-central-pacific-skipjack-yellowfin-and-bigeye-tuna-purse-seine-fishery/@assessments>

<sup>8</sup> ICCAT website; <https://app.powerbi.com/view?r=eyJrjoiNzFmYTg4NmEtNDhjNy00NWUxLTlhZjYtNzRjMm14MjI0DUUwIiwidCI6IjQzYUwUxY2NmLTA0NGYtNDExMy1hNzUwLWZjNlWQ2NjAwMTlmYSIsImMiOiJl9> Assessed on 09.11.2025;

2. **we urge the Commission to adopt Best Handling and Release Practices (BHRP) defining minimum requirements** for the handling and release of sharks for different fishing gear. Juvenile silky sharks are subject to high at vessel and post release mortality but the application of best available science including technical measures on board of purse seine vessels has demonstrated substantial reductions of mortality are possible.<sup>9</sup> IATTC's scientific staff has recently compiled BHRPs for all gears<sup>10</sup> and IOTC WPEB has updated these including specific measures for silky shark bycatch in purse seine fisheries.<sup>11</sup>

#### **Improve Control, Monitoring and Surveillance by**

1. **Establishing a High Seas Boarding and Inspection (HSBI) system**, as required by the United Nations Agreement on the Conservation and Management of Straddling and Highly Migratory Fish Stocks
2. **Prohibiting all transshipments at sea**
3. **Strengthen and improve Port State Measures by all CPCs**
4. **Increase observer coverage immediately to at least 20% for all fleets** as recommended by scientist to be the minimum level needed for evaluating compliance and the catch composition.
5. **Agree on a plan aiming towards 100% observer coverage** by a combination of human observer coverage and utilisation of electronic monitoring systems that fulfil Recommendation 23-18 provisions.



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<sup>9</sup> Murua et al., 2025. New best handling and release practice guide for vulnerable bycatch tropical species in tropical tuna purse seiners ([IOTC-2025-WPEB21\(AS\)-35](#)) and Grande M. et al.; Silky shark post-release survival in the Atlantic Ocean tropical tuna purse seine fishery: A baseline for Best Handling and Release Practices; SCRS/2025/110

<sup>10</sup> Melanie H. et al.; SAC-16-10 REV; Updated best handling and release Guidelines for sharks in IATTC fisheries; 16<sup>th</sup> Meeting of the IATTC Scientific Advisory Committee; La Jolla, California (USA); 02-06 June 2025

<sup>11</sup> IOTC-WPEB21(AS) 2025. Report of the 21st Session of the IOTC Working Party on Ecosystems and Bycatch Assessment Meeting. France and Online, 9 - 13 September 2025 ; [IOTC-2025-WPEB21\(AS\)-R\[E\]: 148pp](#); APPENDIX XVII; <https://iotc.org/sites/default/files/documents/2025/10/IOTC-2025-WPEB21AS-R.pdf>